

Carlson and Ryan LLP
43 West 43rd St., suite 243
New York, NY 10036-7424
+1.917.734.3298 | www.carlsonryanlaw.com

November 9, 2022

By ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *In re: ONE APUS Container Ship Incident on November 30, 2020, 22-md-03028 (PAE)*

This document relates to Navigators Management Company, Inc. v. Airport Clearance Service, Inc. C.A., 22-cv-5223 (PAE) (S.D.N.Y.)

Dear Judge Engelmayer:

We are newly substituted counsel for Defendant / Third-Party Plaintiff Airport Clearance Service, Inc. ("ACS Lines") in the above MDL proceeding in relation to *Navigators Management Company, Inc. v. Airport Clearance Services, Inc. C.A., 22-cv-5223 (S.D.N.Y.)*, and write to respectfully request a 30-day time extension up through and including December 9, 2022 to complete service of process on three foreign Third-Party Defendants, namely Ocean Network Express Pte Ltd of Singapore, Chidori Ship Holding LLC of Japan and the M/V ONE APUS *in rem*.

The Court's Order No. 3 (MDL ECF #36) set a deadline of November 9, 2022 for service on third-party defendants. Defendant / Third-Party Plaintiff ACS Lines requires additional time to complete foreign service of process, Plaintiff does not oppose the requested time extension, and the requested time extension does not affect any other scheduled dates in the MDL proceeding.

For the foregoing reasons, ACS Lines respectfully requests a 30-day time extension to serve foreign Third-Party Defendants in this matter.

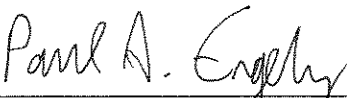
We thank the Court for its courtesy and consideration.

Granted. SO ORDERED.

Respectfully submitted,
CARLSON AND RYAN LLP



Susan Lee, Esq.



PAUL A. ENGELMAYER
United States District Judge
November 10, 2022